

# Exhibit 12



# Top Israeli tax lawyer Doron Levy arrested in Dayan bros case



28 Dec, 2020 16:04 **Ela Levi-Weinrib**

The Amit, Pollak, Matalon & Co. (APM) law firm senior partner denies that he helped the Israeli billionaires allegedly evade tax payments.

Adv. Doron Levy, one of Israel's top tax lawyers, has been questioned, arrested and released on bail in the Dayan brothers alleged tax evasion affair. He is suspected of assisting them in making false presentations in order to evade taxes totaling more than €180 million.

Adv. Doron Levy is a senior partner in the Amit, Pollak, Matalon & Co. (APM) law firm and heads its taxation and class action department. His clients include the largest companies and corporations in Israel and abroad.

Israeli billionaire brothers Itzik and Amir Dayan were arrested on November 9 by the Israel Tax Authority on suspected tax evasion relating to an overseas account opened by a foreign national with hundreds of millions of euros in it. Lawyers acting on their behalf claim their clients are innocent of any wrongdoing.

Nasdaq May 3 23:44	S&P 500 May 3 23:20	TA Bluet May 3 17:24	TA35 May 3 17:24	USD/EUR May 4 04:20	NIS/EUR May 4 04:20	NIS/USD May 4 04:20
-0.48% 13895.12	+0.27% 4192.66	+0.95% 595.34	▲ +0.85% 1654.45	-0.08% 1.2052	+0.13% 3.9174	+0.14% 3.2506

Adv. Doron Levy said, "Since the start of the investigation I have worked in full cooperation with the investigators subject of course to scrupulously protecting lawyer-client immunity."

He added, "I am convinced that after 45 days since the start of the investigation, even the investigators understand that my only role was in providing legitimate and completely proper legal counsel years after the event and that I was no way involved in the assessment agreement signed with the trustees or in the presentations made as part of this. I trust and am sure that ultimately the investigation will make things clear beyond any doubt."

This is not the first time that Levy has been questioned over suspected criminal violations following assistance that he gave clients. In 2017, it was reported that he was questioned under caution as part of the allegations against Israeli billionaire businessman Beny Steinmetz in the Romanian land affair. Levy has denied those allegations.

*Presumption of innocence: Adv. Doron Levy and Amir and Itzik Dayan are only suspects. The criminal investigation is in its early stages and they have not been convicted of any offense and they have the right of the presumption of innocence.*

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